

DEPARTMENT OF AGING

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PROGRAM MEMO (PM)

TO: AREA AGENCIES ON AGING (AAA)	NO.: PM 03-15 (P)
SUBJECT: Annual Project Narrative (PN) Instructions for the Title V/Senior Community Service Employment Program (SCSEP) for Fiscal Year (FY) 2003-04	DATE ISSUED: July 23, 2003
REVISED:	EXPIRES: Until Superseded
REFERENCES: Older Worker Bulletin (OWB) 03-05; OWB 96-12; OWB 96-11; OWB 96-5; Program Memo (PM) 03-04; SCSEP Manual 1999	SUPERSEDES: PM 02-22
PROGRAMS AFFECTED: <input type="checkbox"/> All <input type="checkbox"/> Title III-B <input type="checkbox"/> Title III-C1/C2 <input type="checkbox"/> Title III-D <input type="checkbox"/> Title III-E <input checked="" type="checkbox"/> Title V <input type="checkbox"/> CBSP <input type="checkbox"/> MSSP <input type="checkbox"/> Title VII <input type="checkbox"/> ADHC <input type="checkbox"/> Other: _____	
REASON FOR PROGRAM MEMO: <input type="checkbox"/> Change in Law or Regulation <input type="checkbox"/> Response to Inquiry <input checked="" type="checkbox"/> Other Specify: <u>See subject line.</u>	
INQUIRIES SHOULD BE DIRECTED TO: Your Assigned Title V/SCSEP Specialist	

The purpose of this PM is to provide California Department of Aging (CDA) Title V/SCSEP projects with instructions and procedures for developing their annual PNs for FY 2003-04.

The PN should describe the project's objectives that will be met, the results, and benefits expected; the program approach; and the administrative mechanisms that will be applied. The PN must be prepared in accordance with the United States Department of Labor's (DOL) administrative guidance provided in OWB 03-05. The required information to complete your PN has been provided in an attachment. A copy of OWB 03-05 is available in its entirety and can be located at wdsc.doleta.gov/seniors.

The \$500 Exclusion for Enrollments: Based on California's response to the proposed regulations on the income exclusion policy and guidance from DOL, CDA will only apply this exclusion to the recertification process until final regulations are released by DOL. The income threshold is established under Older Americans Act (OAA), Section 516(2), which defines low-income as "not more than 125 percent of the poverty guidelines."



Experimental Projects under Section 502(e): The past practice of using general SCSEP funds to operate an OAA, Section 502(e) program will no longer be permitted. Plans for competition under the special private sector set-aside under the 2000 Amendments of the OAA, Section 506(a)(1) will be issued in a separate notice.

Unsubsidized Placements: CDA SCSEP projects are expected to place at least 25 percent of their annual authorized positions into unsubsidized employment. SCSEP projects that **do not** achieve at least a 20 percent unsubsidized placement goal are required to submit a plan of action addressing how the goal will be achieved during the next FY.

State SCSEP projects are required to follow-up on each participant placed into unsubsidized employment and document such follow-up at least once within 90 days of placement (SCSEP Manual 1999, Section 2220).

Participants Served: CDA SCSEP projects are expected to serve at least 140 percent of their annual authorized positions. SCSEP projects that **do not** serve at least 140 percent of their annual authorized positions must develop and submit a plan of action addressing how the goal will be achieved during the next FY.

Project Monitoring: AAAs that subcontract SCSEP services must describe the frequency and content of monitoring visits to the subcontractor.

Please ensure that all items in the PN package follow the PN instructions. State SCSEP projects are to adhere to the final SCSEP Regulations of May 17, 1995, unless stated otherwise in the PN Instructions.

Please submit a cover letter to transmit the package to CDA and two copies of your FY 2003-04 SCSEP PN within 30 days from the date of this PM.

Mail your SCSEP PN to:

Senior Community Services Employment Program
Your assigned Title V/SCSEP Specialist
California Department of Aging
1600 K Street
Sacramento, California 95814

Team 1: Cecilia Perez Dunn
Team 2: Denise Wallace
Team 3: Mary Pynn

If you have any questions or need assistance in completing your SCSEP PN, please contact your assigned Title V/SCSEP Specialist.

Original Signed By Lynda Terry

Lynda Terry
Director

Attachment

**CALIFORNIA DEPARTMENT OF AGING (CDA)
SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM (SCSEP)
PROJECT NARRATIVE (PN) INSTRUCTIONS**

This document contains detailed instructions for the completion of the PN. PLEASE READ EACH SECTION OF THE PN INSTRUCTIONS CAREFULLY.

NOTE: New federal regulations are being developed to implement the 2000 Amendments to the Older Americans Act (OAA). When final, they may change reporting and/or other requirements. **Projects must abide by the requirements that are in place at the time the grants are awarded.** However, the requirements, including the regulations, may be revised during the grant period. Projects will be responsible for adhering to any revisions that go into effect during the grant period including, but not limited to, final regulations.

FORMAT

The text of the PN should be single-spaced with one-inch margins at the top, bottom, right and left sides. Pages should be numbered. The use of graphs, maps, and tables is permitted. In addition to using the required section headings, applicants are encouraged to use brief topic headings for paragraphs in the text.

The title, "SCSEP PROJECT NARRATIVE FISCAL YEAR 2003-04" should be centered and the section headings and subheadings should be entered at the left-hand margin.

Number all narrative pages and properly label attachments or enclosures.

CONTENT

Content guidelines for the PN are discussed in the following three sections. The content must be concise and relevant. Avoid direct reiteration of statutory or regulatory requirements. The PN must provide an explanation of the proposed project.

SECTION 1 – TECHNICAL APPROACH

This section requires information about the operations of the proposed project and the methods and procedures the applicant will use to implement them.

A. Plan of Action. Provide a description of each project function or activity. Applicants must provide adequate descriptions for the reviewer to ascertain how the applicant will implement the project. The following activities must be discussed separately:

(1) Recruitment and selection of participants. Indicate the methods and resources that will be used to recruit project participants. Indicate how eligibility will be determined and documented. *Please read the following guidelines carefully.*

According to Section 516(2) of the OAA, only those individuals who are at least 55 years of age and a member of a family with an income of 125 percent or less than the federal poverty guidelines are eligible to receive SCSEP services. Priority is to be given to “minority, limited English-speaking, and Indian eligible individuals, and eligible individuals who have the greatest economic need, at least in proportion to their numbers in the State and take into consideration their rates of poverty and unemployment,” and to persons who are over the age of 60.

In addition, the Jobs for Veterans Act (JVA) of November 2002 established priority for veterans in all Department of Labor “qualified” job training programs. As defined at Section 2(a)(2)(C) of the JVA, which amends 38 USC 4215, SCSEP meets the qualifying criteria as a “program or service that is a workforce development program targeted to specific groups.” Persons covered by this requirement are defined at Section 2(a)(1) of the statute 38 USC 4215(a)(1) as follows:

- A veteran
- The spouse of any of the following individuals:
 - Any veteran who died of a service-connected disability;
 - Any member of the Armed Forces on active duty, who has been listed for a total of more than 90 days as missing in action, captured in the line of duty by a hostile force, or forcibly detained by a foreign government or power;
 - Any veteran who has a total disability resulting from a service-connected disability; and
 - Any veteran who died while a disability so evaluated was in existence.

The veterans’ priority requirements must also be integrated with the special consideration preferences delineated at Section 502(b)(1)(M) of the OAA. These preferences apply, to the extent feasible, to the following individuals: (1) those who have incomes below the poverty level; (2) those who have poor employment prospects; and (3) those who have the greatest social and/or economic need and who are eligible minorities, limited English speakers, or Indians. In applying these preferences, projects are not expected to find such participants; but rather when faced with enrolling several individuals, preference should be given to the individual with these characteristics. If no individual possesses the preference characteristics, then the enrollment must still be based on the age and veteran priorities.

We offer the following examples to demonstrate the practical application of the requirements of both statutes. The examples are divided by age group in descending order of priority:

Eligible Individuals Age 60 or Older:

- Veterans and qualified spouses who meet the special consideration criteria (if feasible);
- Veterans and qualified spouses who do not meet the special consideration criteria;
- Non-veterans who meet the special consideration criteria (if feasible); and
- Non-veterans who do not meet the special consideration criteria.

Eligible Individuals Ages 55-59:

- Veterans and qualified spouses who meet the special consideration criteria (if feasible);
- Veterans and qualified spouses who do not meet the special consideration criteria;
- Non-veterans who meet the special consideration criteria (if feasible); and
- Non-veterans who do not meet the special consideration criteria.

(2) Continued Eligibility for Enrollment in the SCSEP. All sponsors are required to recertify the income of each participant at least once each program year. Indicate the schedule for certifying participants and action, if any, to be taken on behalf of those found to be ineligible. Indicate where eligibility records will be maintained. See OWB 95-5 and 96-5 (OWB 98-31 will be rescinded). Please note that the \$500 income exclusion will only apply to the re-certification process.

(3) Physical Examinations. Describe the arrangements that will be made to offer initial physical examinations and annual physical examinations to participants. These examinations are a service to participants – a fringe benefit of participation – and are not to be used as an eligibility criterion. Providing the results of the examination to the project is optional for the participant. If provided, they should not be included in the participant file. They should be maintained in a secure file to maintain confidentiality. Participants are not required to have an examination, but there should be documentation of an offer to provide an examination. If through their own efforts participants obtain a medical examination or if they have just had one, this will meet the intent of the requirement. Projects are required to offer annual physical examinations to

participants. If a participant waives the exam, this fact should be documented. Please see OWB No. 97-34 for more details.

(4) Orientation. Describe participant and host agency orientation procedures. The description should include mention of participant and agency responsibilities, permissible political activities, grievance procedures, etc.

(5) Assessment. Describe procedures for assessing the job aptitudes, job readiness, and job preferences of participants, as well as their potential for transition into unsubsidized employment. Training and supportive service needs of participants should also be addressed as part of this assessment, which must be administered upon enrollment and at least once each year thereafter. The assessment must also be considered in the formation of each participant's Individual Employability Program (IEP).

(6) IEP. Describe how the assessment will be used to develop the participant's IEP – a plan that includes an employment goal and an appropriate reasonable sequence of services for the participant based on the assessment. The participant must be an active partner in the development of the IEP. The IEP should be reviewed and updated at least once during every 12-month period. More successful projects generally update the IEP more frequently – e.g., on a continuing or as-needed basis.

(7) Placement into Subsidized Employment. Describe how participants will be placed into subsidized employment. Include such factors as:

- (a) Types of community service activities that will be emphasized in assigning participants to subsidized jobs and how they were chosen;
- (b) Methods used to match participants with subsidized jobs;
- (c) Extent to which participants will be placed in work assignments involving the administration of the project itself;
- (d) Types of host agencies to be used and the procedures and criteria for selecting work assignments;
- (e) Average number of hours in participant work weeks;
- (f) Average participant wage rate;
- (g) Participant fringe benefits (if offered); and
- (h) Procedures for assuring participants are given adequate work site supervision.

(8) Training during community service employment and for other employment. Describe the training that will be provided to participants. Training must be related to the participant assessment and to the IEP. It may be related to the SCSEP job duties or it

may be developmental (e.g., the skills developed will enhance the participant's unsubsidized employment opportunities). Projects are reminded that, without a waiver, the number of paid hours of allowable training is limited to 500 hours.

Under the 2000 Amendments to the Older Americans Act, Section 502(e) private sector set-aside is no longer authorized from general SCSEP funds, and projects are **not permitted** to use their community service funding for these private sector projects. In order to compensate, projects should consider other ways to provide participant training. Creative approaches to participant training can be accomplished within the regulatory requirements. Classroom training, lectures, seminars, and individual instruction, singularly and in combination with other activities, are allowable. Job search and job club activities are allowable in combination with other activities. Although the availability of SCSEP training funds is limited because of limitations on the basic cost categories, at least 10 percent of the Federal SCSEP funding can be used for training.

NOTE: A separate OWB on creative training is being developed and will be released soon.

(9) Supportive services. Describe the supportive services – designed to help participants get and keep an unsubsidized job – that will be provided to participants. Identify the source(s) of these services.

(10) Participant transportation. If applicable, describe the arrangements that will be made to provide transportation assistance to participants. Define the reimbursement rate for transportation. (Transportation expenditures should be for the purpose of providing a benefit to participants; they are not to be used to support other programs or services.)

(11) Placement into unsubsidized employment. Describe the steps that will be taken to move or place participants into unsubsidized employment. Include the cooperative measures that will be taken with the Workforce Investment Act and One-Stop Career Centers. Under the current regulations, follow-up is required at least once within a 90-day period in order to satisfy program standards. Please tell us how this follow-up will be done and who will do it. Projects that were unable to place the number of participants that equals at least 20 percent of their annual authorized positions into unsubsidized employment in the prior year (2002) must submit a plan of action for addressing the goal in the forthcoming year, which will be made part of the special clauses for such project. If an applicant has already exceeded the goal for the current year, a corrective action plan is not required.

(12) Maximum Duration of Enrollment. Maximum duration of enrollment is an optional provision of the regulations and, as such, sponsors may elect not to exercise this option. For those projects that wish to exercise this option, please refer to OWB No. 96-12. Describe the efforts taken to ensure that this option is applied equitably and uniformly. What will be the specified time limitation under this option? Describe efforts to ensure that participant rights are safeguarded.

(13) Individual Employability Plan-Related Terminations. Termination of a participant, based on his/her IEP, is an optional provision of the regulations. Because of that, projects may elect not to exercise this option. For those projects wishing to exercise this option, please refer to OWB No. 96-11. Describe efforts to provide adequate notification of this option to participants. Indicate the relationship between this option and the IEP. Describe efforts to ensure that this policy is applied equitably and uniformly. Define the kinds of referrals and number that must be refused in order to implement the IEP-related termination. Indicate situations that would exempt the participant from this policy. Describe how the grievance procedures will be related to the IEP related terminations, including corrective action letters and documentation.

(14) Participant Complaint Resolution. Describe fully the system of due process that will be used in cases where an adverse action is contemplated against a participant or in cases where an applicant for enrollment wishes to dispute an unfavorable determination of eligibility. Attach an example of the written explanation of the due process system that is given to each participant.

(15) Over-Enrollment. Describe the utilization of participants when there is over-enrollment, and the anticipated number of participants that could be employed above the number of authorized positions. Describe how participants will be notified of their short-term status, and how the short-term status of participants will be identified in participant records. Because of possible changes in national grantees, it is conceivable that some temporary participants will lose their SCSEP positions. Because of that, State projects are encouraged to enroll such participants, if they have the capability to do so.

(16) Maintenance of Effort. Describe steps to be taken to ensure compliance with the Maintenance of Effort provision. The maintenance strategy “will result in an increase in employment opportunities which would otherwise be available; will not result in the displacement of currently employed workers (including partial displacement, such as a reduction in the hours of non-overtime work or wages or employment benefits); and will not impair existing contracts or result in the substitution of federal funds for other funds in connection with work that would otherwise be performed; will not employ or continue to employ any eligible individual to perform work the same or substantially the same as that performed by any other person who is on layoff.” See OAA Amendments, Sections 502 (b)(1)(F) and 501(b)(1)(G).

B. Performance Goals. Specify:

- (1) The number of authorized community service employment positions under the program;
- (2) The number of unsubsidized placements to achieve at least a 25 percent rate during the funding period; and

- (3) The number of participants to be served during the program year

As a result of the new regulations, we anticipate that new performance measures will become effective at the beginning of FY 2004-05. Projects will be advised of changes, and will be asked to collect data on additional performance measures during FY 2003-04. The addition of new performance measures will impact the collection of information and the use of staff resources, both in terms of program operations and data collection. Implementation of new measures will result in the need to train projects. Please be advised that the U. S. Department of Labor plans to provide some software system assistance to smooth the transition to new reporting requirements.

SECTION 2 – PROGRAM ADMINISTRATION

A. Organizational Structure. Describe the organizational structure of the project, including an explanation of the mission and function of each unit connected with the project.

B. Subproject Management. In completing this section projects need not provide specific information on their subgrantees or contractors. CDA is interested only in general procedures and practices utilized by the project to manage and select their subproject operators. Projects must describe how they will assure that subgrantees, affiliates, contractors, or other entities receive adequate resources to effectively operate local projects. [See OAA, Section 502(b)(1)(R)].

C. Training of Subproject (Local) Staff. Describe the training that will be provided to increase the skills, knowledge, and abilities of local staff. Where applicable, include a description of the proposed staff training with dates, content, and potential participants.

D. Project Monitoring. Explain the methods and procedures to be used to monitor and evaluate project activities, subgrantees, and contractors to determine whether the project is being administered in accordance with federal guidelines and regulations and whether project goals and timetables are being met. Respond to the following issues:

- (1) Frequency of monitoring/evaluation visits to local projects;
- (2) Person(s) responsible for monitoring and evaluation;
- (3) Criteria used to monitor and evaluate project activities;
- (4) Methods for prescribing remedial action when necessary;
- (5) Follow-up procedures to ensure that any identified problem has been remedied;
and
- (6) Validation of sub-project reports.

In general, local projects should be monitored no less than once each FY grant period. All written monitoring reports and subsequent follow-up actions must be made a part of the permanent files.

E. Financial Monitoring. Describe how the financial management system of local subprojects will be monitored. The following issues should be addressed:

- (1) Person(s) responsible for monitoring subgrantee expenditures;
- (2) Frequency of monitoring of expenditures;
- (3) Follow-up procedures to be used; and
- (4) Validation of financial reports.

All written monitoring reports and subsequent follow-up actions must be made a part of the permanent files.

F. Audits. Describe audit coverage including plans to audit local projects as well as plans to audit the headquarters activities. To the extent feasible, provide dates, possible audit firms and selection procedures for future audits. Provide specific references to the most recent audit. Include the name of the audit firm and the date, and attach a copy.

SECTION 3. CONTINGENCY PLAN FOR PARTICIPANTS:

Projects should describe how on-board participants will be transferred to new grantees if a project loses all or some of its positions. Such losses may occur if there are position reductions resulting from competition, swaps, new Census data, or reductions in funding. In this section, please address the following issues:

- (1) How and when the participants will be notified;
- (2) Records, if appropriate, that will be turned over to the new grantee;
- (3) Efforts to place program participants into other employment and training opportunities;
- (4) Services that will be provided to ease the transition; and
- (5) How final payroll payments will be made;

By accepting this grant, the project agrees to carry out the transition plan should that be necessary.